



**ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT  
(AHWMMA)**

**Compliance Evaluation Inspection (CEI) Report**

**1) Author of Report**

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Environmental Scientist, Senior  
Compliance and Enforcement, Industrial Hazardous Waste Branch  
Alabama Department of Environmental Management (ADEM)  
1400 Coliseum Boulevard  
Montgomery, AL 36110

**2) Facility Information**

Sejong Alabama, LLC  
450 East Old Fort Road  
Fort Deposit, Lowndes County, Alabama 36032

EPA ID Number: ALR00005810  
NAICS Code: 336399  
Telephone: (334) 227-0821

**3) Responsible Officials**

Blake Miley, Environmental Health & Safety Manager - Sejong  
Email: [ [HYPERLINK "mailto:bmiley@sjausa.com"](mailto:bmiley@sjausa.com) ]  
Telephone: (706) 816-1502  
Tanya Speir, Human Resources Manager – Sejong  
Email: [ [HYPERLINK "mailto:tspeir@sjausa.com"](mailto:tspeir@sjausa.com) ]  
Telephone (334) 227 – 0821 Ext. 506

**4) Inspection Participants**

Ms. Speir  
Mr. Dale Beach, Quality Manager – Sejong  
Mr. Chris Kim, Plant Manager - Sejong  
Ms. Paula Whiting, Environmental Engineer  
US Environmental Protection Agency - Region IV  
Ms. L. J. Knickerbocker

**5) Date of Inspection**

March 21, 2016

**6) Applicable Regulations**

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations.



7) **Purpose of Inspection**

The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

8) **Facility Description**

Sejong Alabama LLC (hereinafter "Sejong") assembles exhaust systems as a Tier 1 supplier for Hyundai and Kia. The facility consists of a single assembly plant with five separate welding areas. Each welding area is served by its own baghouse. See Photograph #1 for an aerial view of the site.

In its most recent notification of regulated waste activity prior to the inspection (ADEM Form 8700-12, dated October 24, 2014) Sejong identified itself as a conditionally exempt small quantity generator of chromium sludge (EPA hazardous waste number D007), a small quantity handler of universal waste, and a used oil generator. Subsequent to the inspection, on March 22, 2016, Sejong identified itself as a small quantity generator of chromium waste (EPA hazardous waste number D007), a small quantity handler of universal waste, and a used oil generator.

9) **Observations**

On March 21, 2016, Ms. Whiting and I (hereinafter "we" or "us") arrived at the site at 1:15 p.m. and proceeded to the front lobby, where we met Ms. Speir and Mr. Beach. We introduced ourselves and explained the purpose of our visit. We proceeded to a conference room where we held the opening meeting and the facility representatives provided background information about the site and an overview of its operations.

The site was established in 2004; it has operated continuously since that time. It currently operates from sixteen to twenty hours per day, Monday through Friday; it runs two 8- or 10-hour shifts, depending on the demand from the vehicle assembly plants. It has one hundred sixty employees; of these, eight handle hazardous waste on a routine basis.

The largest wastestreams handled at the site are chromium-containing baghouse dust and filters; the dust is generated when stainless steel exhaust components are welded together. Additional wastestreams include: universal waste lamps and batteries; used oil; and waste paint/solvents, spent paint pens, and residues drained from spent aerosol paint cans (EPA hazardous waste numbers D001, D035, F003, and F005).

During the past three years, hazardous wastes have been sent to EWS (EPA identification ALD981020894), in Glencoe, Alabama, Tradebe Treatment & Recycling of TN (EPA identification TND000772186), in Millington, Tennessee, and Safety-Kleen Systems, Inc. (EPA identification KYD053348108) of Smithfield, Kentucky. Used oil is collected by Smith Waste Oil (EPA identification ALR000043356). Universal Waste is sent to Environmental & Recycling Solutions (EPA identification ALR000044990), of Opelika, Alabama.

Following the opening meeting, Ms. Speir, and Mr. Beach, accompanied us on the walk-through inspection. Mr. Kim joined us during the walk-through.

During the walk-through inspection, we noted the following:

**Breezeway**

The Breezeway (an enclosed passage that marks the separation point between the administrative offices and the production floor) is used to accumulate universal waste lamps and batteries, spent paint pens, and electronic devices pending removal from the site. We observed the following items:

- Four corrugated cardboard boxes holding spent universal waste (UW) fluorescent lamps



- One corrugated cardboard box holding broken fluorescent lamps; it was closed, labeled with the words “Hazardous Waste”, and dated. The accumulation start date was September 1, 2015.
- One uncontained HID lamp
- One unmarked 55-gallon drum holding three spent paint pens
- Two 5-gallon plastic buckets holding UW batteries (one each of Ni-Cad and Lithium ion)
- One open plastic bin holding several UW lead-acid emergency lighting batteries
- Seventeen spent fluorescent lamp ballasts
- Two unwanted microwave ovens

The following noncompliant issues were noted in this area:

- The four boxes containing UW lamps were not marked or closed (the flaps were not closed or sealed);
- The uncontained HID lamp was placed on top of the box containing the broken lamps. It appeared to be intact, but was not marked in any way. Representatives of Sejong were not sure if this lamp was a waste (it was subsequently managed as UW);
- The drum that contained the spent paint pens was closed, but was not marked with the words “Hazardous Waste”. The pens contain xylene and are disposed as a hazardous waste;
- The containers holding the UW Ni-Cad and Lithium ion batteries were both closed and marked appropriately, but were not dated;
- The UW lead-acid batteries were intact, but were not marked or dated;

*In an email dated March 23, 2016, Mr. Blake Miley provided documentation that these issues had been addressed. All UW items were contained, labeled and dated; all hazardous wastes were correctly marked.*

The facility representatives were not able to demonstrate how they tracked the accumulation of any universal wastes; they were also not certain how they intended to manage the spent lamp ballasts or the microwave ovens.

See Photograph #2 through Photograph #5.

#### Used Oil

Used oil is generated from various equipment maintenance activities conducted throughout the site. The oil is collected and brought to the Used Oil storage area, which consists of two 250-gallon totes staged over a secondary containment unit at the northeast corner of the facility. Both totes were in good condition, closed, and clearly marked with the words “Used Oil”. No issues were noted in this area. See Photograph #6 and Photograph #7.

#### Bag Houses

Sejong has five baghouses that collect chromium-contaminated welding dust.

The “LFA” unit, located near the north east corner of the building, had two 55-gallon drums attached to the unit; one was full, while the other was about half filled. Both were marked with the words “Hazardous Waste” and were closed. The lid of the full drum appeared to be rusted.

The “UD” unit, located near the mid-point of the east wall of the plant, serviced a welding line that was shut down on December 14, 2015. It had two full 55-gallon drums still attached to the unit; both were marked with the words “Hazardous Waste” and were closed, but two drums were not dated and had not been removed from the unit and placed into hazardous waste storage. One drum appeared to be significantly rusted. The “return air” duct was vented to the outside; per Mr. Kim and Ms. Speir, the air returned from the filtration unit was either too hot or too cold, making it difficult to control the air temperature in the vicinity of the unit.



The “WCC” unit, located along the east wall of the plant between the “UD” unit and the “#4” unit, had two partially filled 55-gallon drums. Both were marked with the words “Hazardous Waste” and were closed, but the lids appeared to be significantly rusted. Again, the “return air” duct was vented to the outside to make it easier to control the air temperature in the vicinity of the unit.

The “#4” unit, located near the south east corner of the building, had two full 55-gallon drums attached to the unit. Both were marked with the words “Hazardous Waste” and were closed. The drums did not show any significant amount of rust.

The “#5” baghouse, located near the center of the north wall of the plant, had two 55-gallon drums attached. Both were closed and in good condition. One was marked with the words “Hazardous Waste”, while the other was not marked or labeled.

See Photograph #8 through Photograph #15.

*In an email dated March 23, 2016, Mr. Blake Miley provided documentation that these issues had been addressed. All full containers were moved to hazardous waste storage, the rusted containers and lids have been replaced, lids that shed water have been ordered, and all drums are correctly labeled.*

#### Maintenance Area

In the maintenance area, located near the Breezeway, facility employees maintain and repair site equipment. There is one parts washer unit that is maintained by Safety-Kleen. Used oil-saturated sorbents and spent aerosol paint cans are generated during maintenance and repair activities; the aerosol cans are punctured using a drum-mounted puncture device. Spent universal waste fluorescent lamps were also stored in this area.

The satellite accumulation container equipped with the aerosol can puncture device was closed, labeled with the words “Hazardous Waste”, and appeared to be in good condition.

The 55-gallon open-top drum holding the oil-saturated material was closed and in good condition, but was not marked with the words “Used Oil”. Instead, it was labeled with the words “Oily Hazardous Waste”.

The UW lamps were stored in a corrugated cardboard box; the box was not closed and was not marked or labeled with any of the required phrases that denote universal waste. The box was not dated and facility personnel were not able to state when the lamps became waste.

See Photograph #16 through Photograph #19.

*In an email dated March 23, 2016, Mr. Blake Miley provided documentation showing that the container of UW lamps was closed, marked, and dated.*

#### Records Review

Based on Sejong’s reported status, we requested the following documents and records:

- Hazardous waste determinations
- Documentation of the quantity of hazardous waste generated each month
- Waste profiles
- Manifests
- Land disposal restriction forms

The following records were not available for review:

- Documentation of the quantity of hazardous waste generated each month
- Waste profiles for all waste disposed in Alabama
- Land disposal restriction notices



Sejong was able to provide hazardous waste determinations for all wastes generated at the site and some of the manifests for shipments of hazardous and universal waste; the remaining manifests were provided via email on March 29, 2016. The paint and solvent waste carried EPA hazardous waste numbers D001, D035, F003, F005. The chromium-containing baghouse dust and filters carry EPA hazardous waste number D007.

Facility representatives could not provide documentation of the quantity of hazardous waste generated each month, but based on a review of the hazardous waste manifests that were provided subsequent to the inspection, Sejong has reached large quantity generator status at least twice since July of 2014. On July 2, 2014, the site shipped off 680 pounds of hazardous waste (paint related materials). On August 21, 2014, which was the next hazardous waste shipment, 2,350 pounds of chromium-containing dust was sent off-site. On May 22, 2015, 110 pounds of the chromium-containing dust was sent off-site. On June 2, 2015, which was the next hazardous waste shipment, another 7,025 pounds of that same waste was shipped.

Sejong Alabama had not provided any form of training to its employees.

*In an email dated March 23, 2016, Mr. Blake Miley provided documentation that Sejong Alabama intends to provide training to employees that manage hazardous waste.*

#### 10) **Summary**

The following potential areas of noncompliance were noted at the time of the inspection:

- Sejong Alabama could not provide documentation of the quantity of hazardous waste generated each month.
- Sejong Alabama has shipped large quantity generator quantities of hazardous waste off-site at least twice since July of 2014; the most recent shipment occurred on July 2, 2015.
- Sejong Alabama did not notify the Department of its regulated waste activity between October 24, 2014 and March 22, 2016.
- Sejong Alabama did not provide all requested documentation during the inspection.
- Sejong Alabama did not provide training to its workers that handle hazardous waste.
- Sejong Alabama did not mark six containers holding universal waste (UW) lamps and several UW batteries with the required language.
- Sejong Alabama did not close five boxes of UW lamps.
- Sejong Alabama did not have a method in place to ensure it did not store UW at the site for greater than one year. None of the materials identified as UW were dated and facility representatives were not able to demonstrate any other method used to document how long UW was accumulated at the site.
- Sejong Alabama accumulated one box containing hazardous waste fluorescent lamps since September 1, 2015, a total of 203 days.
- Sejong Alabama left two filled satellite accumulation containers of chromium-containing dust in place at the UD baghouse from the time that unit was deactivated on December 14, 2015, a total of ninety-nine days.
- Sejong Alabama did not store hazardous waste in containers that were in good condition. Four of the drums associated with the baghouses had rusted lids or bodies.



- Sejong Alabama did not mark all containers holding hazardous waste with the words “Hazardous Waste”. One 55-gallon drum holding chromium dust and one 55-gallon drum holding spent paint pens were not marked in any way.
- Sejong Alabama did not mark one 55-gallon open-top drum holding the oil-saturated material with the words “Used Oil”. Instead, it was labeled with the words “Oily Hazardous Waste”.

Following the inspection, we met with the facility representatives for a closing meeting. We reviewed our observations, and gave them the opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* describing our observations. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* that addressed the areas of potential noncompliance noted during the inspection. We left the top copy of the form and several guidance documents with facility personnel and departed the site at 5:00 p.m.

11) **Signed**

Compliance and Enforcement Section  
Industrial Hazardous Waste Branch  
Land Division

**April 14, 2016**

Date

12) **Concurrence**

Clethes Stallworth, Chief  
Compliance and Enforcement Section  
Industrial Hazardous Waste Branch  
Land Division

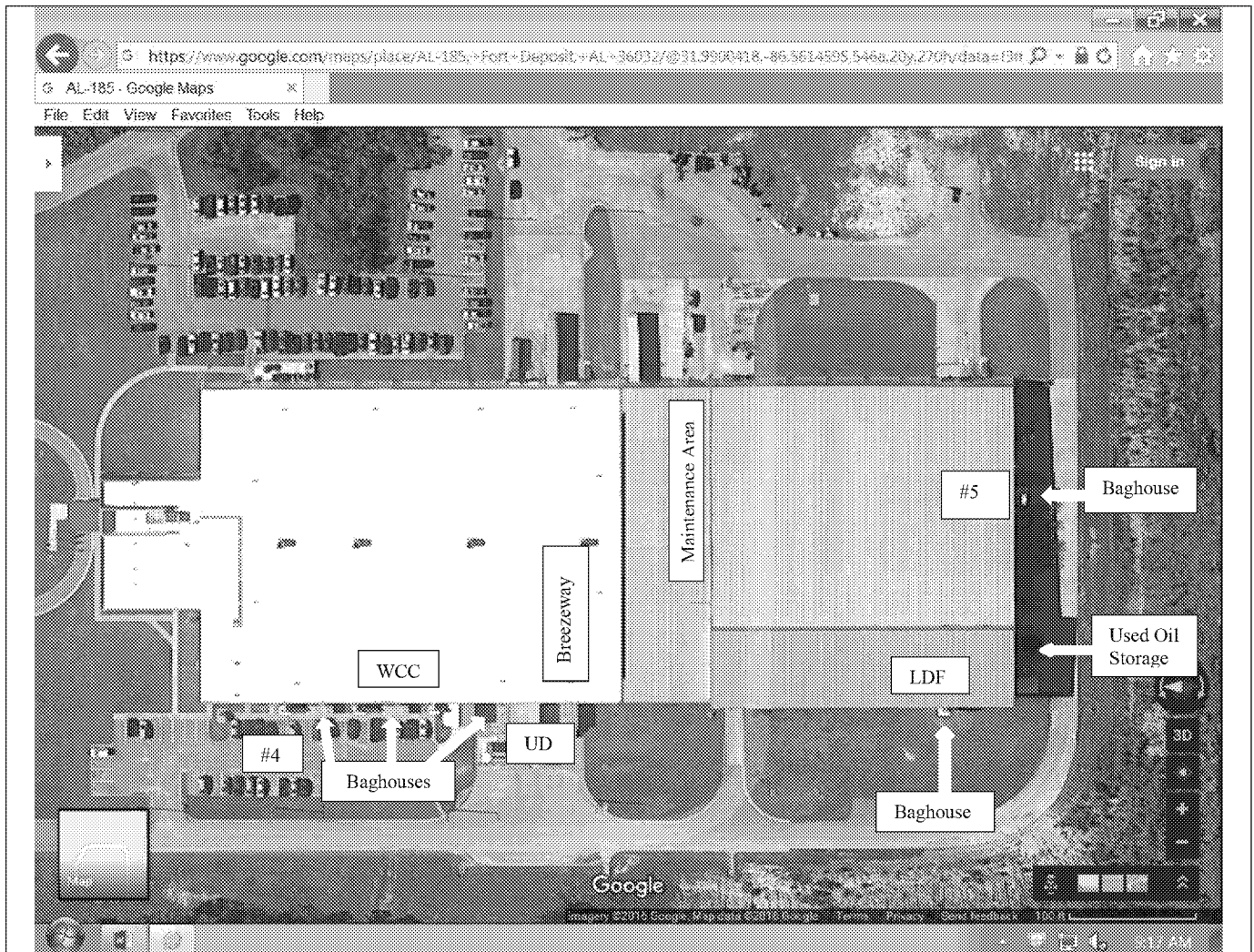
**April XX, 2016**

Date

Attachment - Photo Log

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## ATTACHMENT – SEJONG ALABAMA LLC PHOTO LOG



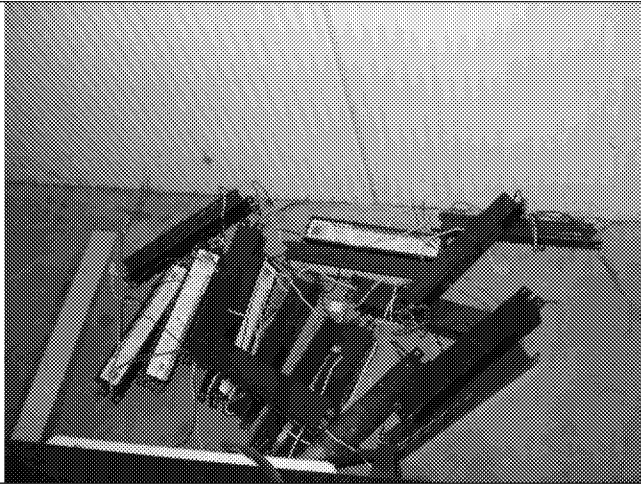
1. Google Maps view of site



2. Universal waste lamps, including one not contained



3. Universal waste lead-acid batteries



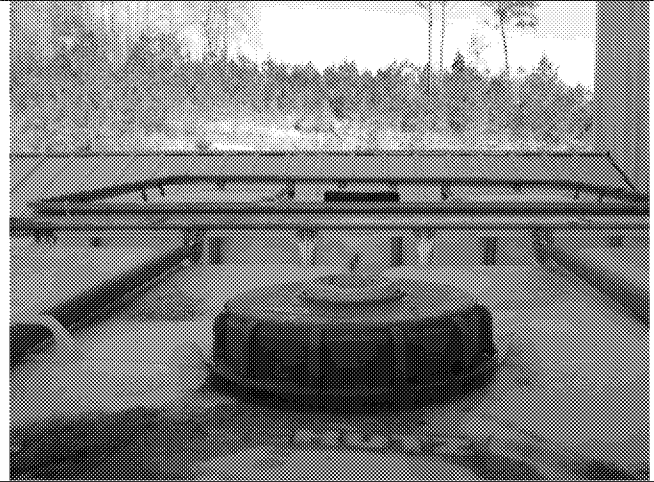
4. Spent electronic ballasts



5. Spent paint pens – D001



6. Used Oil storage area



7. UO totes - closed



8. LFA Baghouse

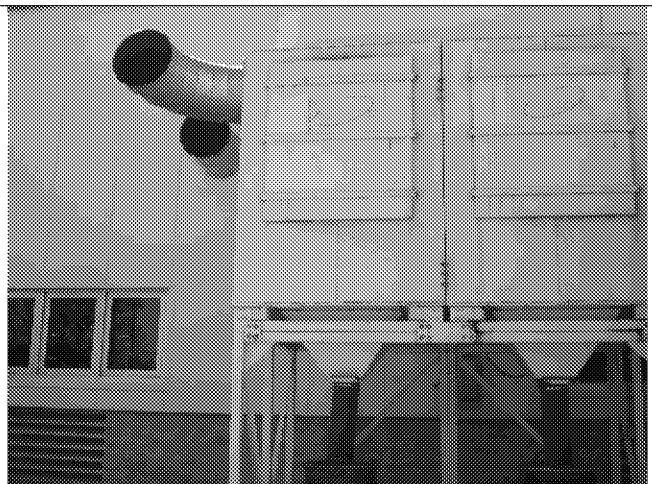


9. UD Baghouse





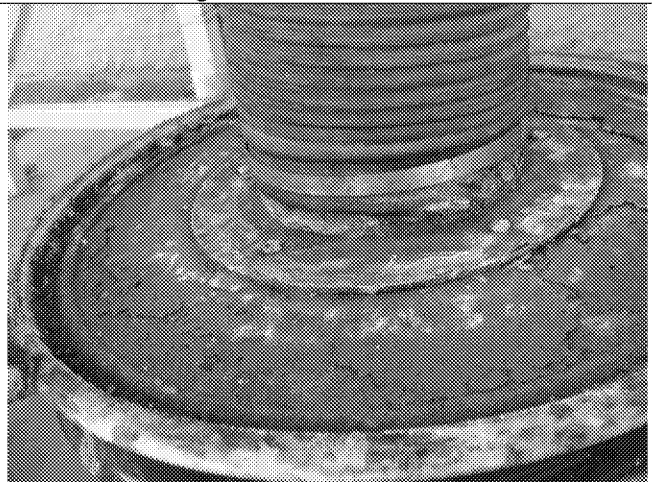
10. UD Baghouse – Rusted drum



11. UD Baghouse – Return air disconnected



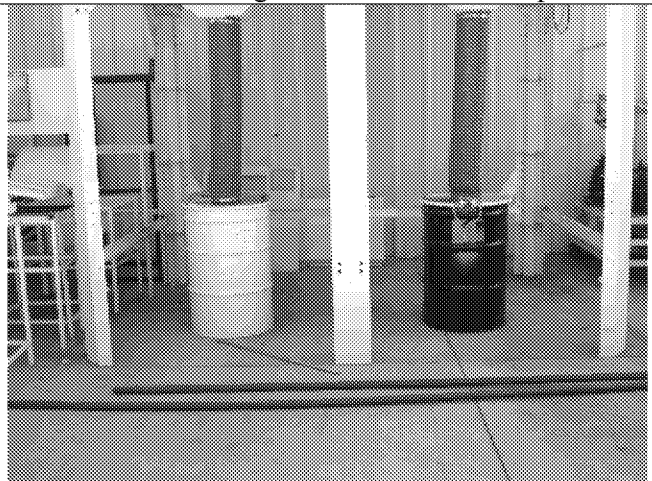
12. WCC Baghouse



13. WCC Baghouse – rusted drum top



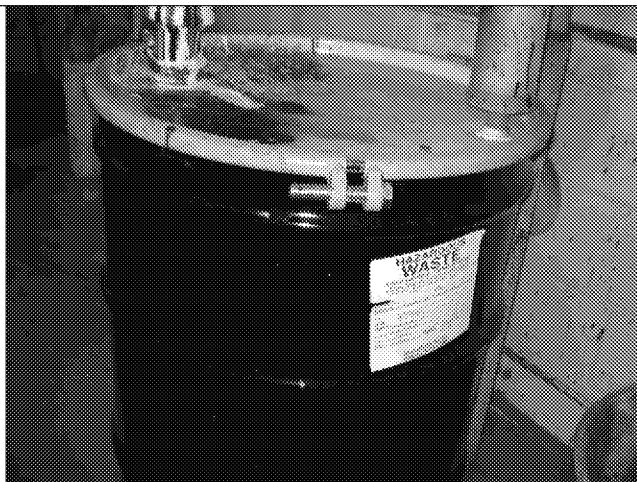
14. 4<sup>th</sup> Baghouse



15. Maintenance Shop - Baghouse



16. Maintenance Shop - Aerosol can puncture unit



17. Maintenance Shop - Aerosol puncture unit label



18. Maintenance Shop - Oil saturated sorbents



19. Maintenance Shop - Universal Waste lamps